

REILLY TAR & CHEMICAL CORPORATION

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Madison Co.

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RCRA General File

February 19, 1988

Illinois Environmental Protection Agency Larry Eastep, P. E., Manager Division of Land Pollution Control 2200 Churchill Road Springfield, Illinois 62706

Dear Larry:

On July 27, 1987, we were attempting to unload a tank car ACFX 14807, into a storage tank. The tank car contained approximately 8000 gallons of creosote oil. During the unloading process, the operator was removing the bottom outlet cap to connect the suction line to the tank car; and when the outlet boot cap was removed and before the suction line was connected, in the operator had no chance to connect the suction line because the oil was about 180° F.

Virtually all of the 8000 gallons of oil went on the ground, however, we were able to pump and recover 1,600 gallons of oil. The tank car was being unloaded on Track #1 and an area approximately $310' \times 25'$ was covered with oil.

The cause of the incident was twofold; 1) operator not following proper procedures and 2) a 1/2" pipe wedged under the internal valve seat. On the tank cars, there is an internal valve and an external safety valve holding the material inside the tank car. The proper procedure is to check the internal valve by checking the valve stem on top of the tank car; then proceed to the bottom of the tank car and open the bottom outlet valve to see if the internal valve is secure. If the internal valve is holding, then the bottom valve and boot cap are removed to connect the suction line. The bottom valve was not checked and when the boot cap and valve were removed, the oil started coming out immediately. Several attempts were made to shut the internal valve and plug the outlet with no success. The car emptied in approximately twenty minutes and after the car was empty, we found a 1/2" pipe wedged under the internal valve keeping it from closing.

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The clean-up was started immediately. Sand was spread to absorb and keep the oil from spreading with our front end loader. Moore Construction was called in with their backhoe to start excavating immediately. The contaminated soil was stored in our Hazardous Waste Storage Area and was being transported to Peoria Disposal. The majority of the contaminated soil was excavated by the end of August.

Approximately 300' of track and fence were removed and an area approximately 310' x 25' x 3 to 4' of soil was excavated. 1458 yds. of contaminated soil has been hauled to Peoria Disposal with approximately 100 yds. remaining to be hauled to Peoria Disposal.

The afternoon of July 27, 1987, the National Response Center was notified and the next morning, July 28, the local Emergency Services and Disaster Agency office, Louise Wade, was contacted. She then reported the incident to the I.E.P.A. and that afternoon Tom Powell, I.E.P.A., came out to inspect the site. On August 3, Tom Powell and Mike Grant, I.E.P.A. came out to inspect the site and to see how we were progressing on the clean-up. Jeff Benbinek, I.E.P.A. was at the plant on September 14 to conduct an air inspection and said he was asked to inspect the spill area. Mike Grant came to inspect the site on October 1, 1987, and he took several photographs during his visit. On October 15 Ken Liss, Chuck Reeter, Todd Rowe, and Charlie Zeal, I.E.P.A., inspected the site. Juana Rojo, U.S.E.P.A., while she was here on other matters on October 16, also in pected the site.

Mike Grant and Pat McCarthy, I.E.P.A. came to the plant on October 23 to conduct a final inspection so that we could proceed with the concrete pad and railroad track installation. They felt there was not much more we could do and said we could proceed with the installation. There was an area that contained water and Mike wanted us to pump the water out so he could see the soil. This was done and Mike came back out on October 26 and gave his final approval.

We proceeded with the installation of the concrete spill pad which will contain 20,000 gallons of material. This should alleviate ground contamination from any similar event in the future.

Our operating procedures have been reviewed with the pump operators and will be reviewed on a periodic basis.

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The costs for the clean-up, disposal, and pad installation will be in the neighborhood of \$300,000.00.

Sincerely,

REILLY TAR & CHEMICAL CORPORATION

Larry L. Pirtle, Manager Granite City Plant

LLP/bjm

cc: Jauna Rojo U.S.E.P.A., Region 5 230 South Dearborn Street Chicago, Illinois 60604